

CPSA 6 (b)(1) Cleared  
X 4/1/94  
Products identified  
Exempted by  
Final product  
Comments processed.

## LOG OF MEETING

**SUBJECT:** Labeling Packages of Charcoal  
**Date of Meeting:** April 22, 1994  
**PLACE:** CPSC Headquarters  
**LOG ENTRY SOURCE:** Sharon R. White *SLW*

### COMMISSION ATTENDEES:

George Rutherford, Jr., EPHF  
Sharon White, EPHF  
Mary Donaldson, ECSS  
Jacquie Elder, EXHR  
Laureen Burton, HSHE  
Harleigh Ewell, OGC  
Leonard Schachter, EPHA

### NON-COMMISSION ATTENDEES:

Phil Dunaway, Embers Charcoal Co.  
Bob Gossett, Royal Oak Enterprises  
Daren Keeter, Royal Oak Enterprises  
Greg Williams, Royal Oak Enterprises  
Ann Spehar, BIA  
Ernest Gillam, Kingsford  
Jim Wiersig, Kingsford/Clorox  
Jonathan Swiskow, Hickory Specialties  
Neil Hampson, MD, Virginia Mason Clinic, Seattle

### SUMMARY OF MEETING:

The purpose of the meeting was to present staff's recommendations for revising the warning label on packages of charcoal and to afford interested parties the opportunity to comment on staff's recommendations.

George Rutherford, Jr. (Acting Director of Human Factors) opened the meeting by describing the activities undertaken by CPSC on the issue of burning charcoal indoors and by noting the purpose of the meeting.

Following the introduction, Sharon White (Human Factors) provided additional background information on charcoal labeling and presented staff's recommendations in terms of improving the motivational content of the label, precautionary measure, and enhancing the understandability and visibility of the warning label. As part of the presentation, Dr. Hampson of Seattle, Washington, presented data on CO poisonings from charcoal use indoors.

Following the presentation, the meeting was opened up to discussion for all parties in attendance. The outcome of the meeting is as follows:

Industry is willing to revise the warning label, however, a number of concerns were raised. The concerns include:

1. Some manufacturers at present have the capability of imprinting only six colors on their bags; the color orange for the signal word panel may present an economic problem for these manufacturers. Some companies may be at a competitive disadvantage if they cannot provide additional color capacity to their clients, if demanded. The largest manufacturer has the capability of imprinting 8 colors. The economic impact associated with adding orange to the label for this manufacturer may be smaller. Some companies have invested a "look" in their bags; requiring an additional color may pose a problem. The staff mentioned that the color orange for the signal word panel is consistent with ANSI Z535.4 and could enhance the visibility of the warning label.

Related issue: Industry raised issues about staff's recommendation regarding contrasting color: black lettering against white background. Those manufacturers that do not currently use black and white on their bags would have to redesign and replace their plates to accommodate this recommendation. Industry wants more flexibility in terms of selection of contrasting colors (want to use colors already existing on bag). The staff mentioned that the research indicates that users prefer black lettering against a white background as this contrast is most legible.

2. Industry is concerned that existing stock may remain after the labeling rule becomes effective. If the rule applies to bags printed after the effective date, costs to them would be minimized.

3. Industry attendees acknowledged the value of a pictogram because they recognized that the data that was presented indicated the need for one. The staff offered industry the opportunity to develop a pictogram, and those in attendance were willing to accept the challenge. Industry will present us with examples of pictograms some time during the early summer.

The industry questioned where the staff envisioned the pictogram on the warning label. The staff mentioned that the pictogram could be placed either 1) below the signal word panel and above safety messages or 2) have a 2-column label wherein the pictogram is located on one side and the safety messages on the other. If the first option is chosen, this could add height to the label which could impact the rest of the graphics on the bags which would mean they would have to change plates at a cost to them. To minimize the impact, industry wants the CPSC to consider relaxing the position restrictions of the label so that the label

is raised close to the seams on the bag. The staff indicated that this may be considered. If the second option is chosen, this may minimize the impact on the rest of graphics on the bag.

4. Industry wants the staff to consider making the size of the lettering/label proportionate to the size of the bag. The staff recommends that the type size be 11-point type for the different size bags as the research indicates that a type size between 10- and 11- point type produces faster reading.

5. Industry wants the staff to consider removing the word "poisoning" from the label. The rationale for this request is that consumers may think that if charcoal is used to cook food, then their food could be poisoned. The staff indicated that this may be considered.

6. Industry questioned why "ventilation" would not be included in the proposed warning label. The staff mentioned that it may convey to consumers that it is safe to burn charcoal indoors if ventilation is provided. The staff further mentioned incidents wherein it appeared that "ventilation" was provided, but victims either suffered from CO poisoning or died.

7. Industry questioned whether the staff considered the effectiveness of the revised warning label. One CPSC representative stated that revisions to the label may be minimally effective, and given this, it may be difficult to attribute reduction of deaths and injuries to changes in the label. Additionally, any number of variables may lead to a reduction of deaths and injuries such as an information campaign warning against indoor use of charcoal, therefore, it may be difficult to conclude that the label directly reduced deaths and injuries. The staff reiterated, however, that the main issue is that the current label is misleading and needs to be revised.

8. Industry questioned whether the staff considered if the proposed warning label would impact restaurants that use charcoal briquets. The staff said that the label says "Never use charcoal inside homes, tents, or vehicles."

9. Industry wants the staff to consider relaxing the requirement that a warning label be placed on both the front and the back of the bags of charcoal, given that the staff proposed recommendations that may increase costs for industry. Specifically, an industry representative proposed that the label be on the front of the bag only, to allow more room on the back of the bag for more advertisements. The staff indicated that this may be considered.